



COMDTINST 16478.11

SEP 27 1994

COMMANDANT INSTRUCTION 16478.11

Subj: AIDS TO NAVIGATION BATTERY TRACKING SYSTEM

Ref: (a) Hazardous Waste Management Manual, COMDTINST M16478.1B

1. PURPOSE. This Instruction outlines procedures for implementing a standard method of tracking Aids to Navigation (AtoN) batteries.
2. ACTION. Area and district commanders, group commanders and unit commanding officers shall ensure the provisions of this Instruction are followed.
3. DIRECTIVES AFFECTED. The procedures outlined in this Instruction will be incorporated into the Aids to Navigation Manual - Administration, COMDTINST M16500.7.
4. DISCUSSION.
 - a. There are approximately 15,300 lighted aids to navigation that are battery powered. Batteries contain heavy metals and corrosive electrolyte which if released may pose a threat to the environment. Therefore, it is illegal to dispose of batteries in other than licensed landfills or recycling facilities as directed by reference (a). At the present time the Coast Guard does not have a standard system to account for batteries and cannot determine where a battery found in the environment was used or whether its loss was accidental.
 - b. The loss of aids to navigation batteries from Coast Guard aids has been the subject of regulatory interest in a variety of locations. Due to the lack of a standard battery tracking system, our units have been unable to adequately respond to regulatory inquiries concerning the

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 - b. (cont'd) numbers and locations of batteries which have been lost into the environment. In addition, recovery of lost batteries is made more difficult and time-consuming due to the lack of such a system.
 - c. The Coast Guard is undertaking this effort in order to go beyond the minimum legal requirements and ensure that all ATON batteries in use can be accounted for until they are released from Coast Guard control for disposal or recycling. The use of the system provides greater protection for Coast Guard personnel against personal liability which may be imposed for violation of environmental laws. The ability to adequately respond to regulator inquiries when a battery is discovered in the environment is of great value in protecting our personnel from accusations of illegal battery "dumping."
 - d. Batteries will be identified through the use of Coast Guard generated serial numbers. Responsibility for maintaining the records tracking system rests with the unit exercising custody or control over the battery. Given that Coast Guard units use a variety of battery procurement and disposal methods, the system will require some flexibility and follow-on tracking as a battery makes its way into a successor unit's custody. The system requires the use of a battery log (paper or electronic) which tracks individual batteries and appropriate property transfer documents (i.e., DD-1348 and DD-1149) which ultimately release control of the batteries for disposal or recycling.

5. PROCEDURES.

- a. All AtoN units that install/service batteries will be required to maintain a Battery Accountability Log. The new Aids to Navigation Information System (ATONIS 2.0), scheduled for Coast Guard-wide implementation in FY95, will contain fields for servicing units to enter battery tracking data. The data will be transmitted electronically to district offices who will be responsible for maintaining the historical file. Until ATONIS is implemented, hand written or electronic (document designer or spreadsheet) logs are required.
- b. An initial supply of serialized decals, i.e. 01-00001, will be supplied to each district late in FY94. Blocks of sequential numbers will be assigned to individual units by the district office. Decals will be affixed to the battery near the negative terminal. Care should be taken not to cover the charge indicator on the Delco manufactured battery.

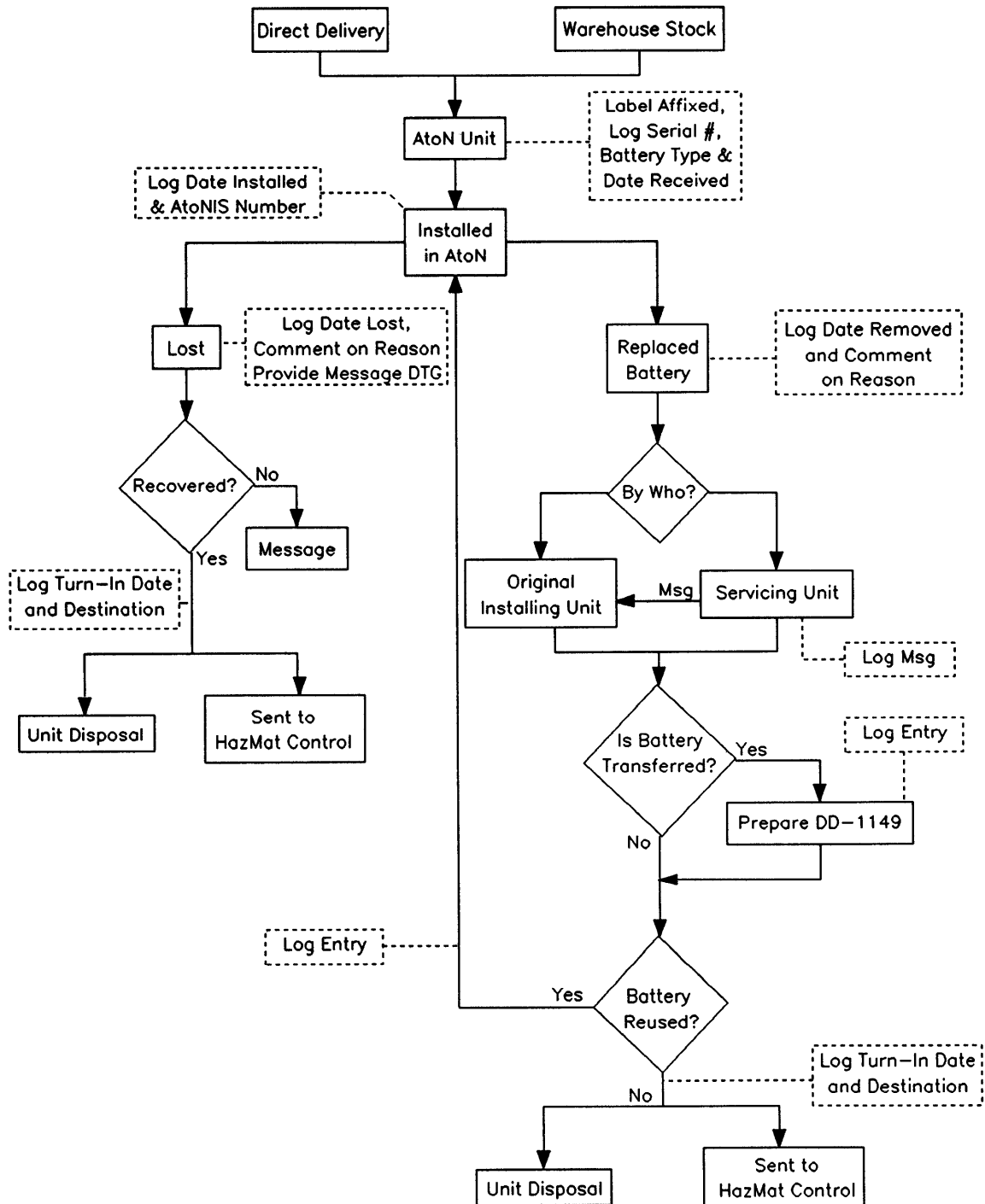
- c. Entries will be made in the log when:
 - (1) Serial numbers are assigned when batteries are received at the servicing unit.
 - (2) Batteries are installed, removed, transferred or lost.
 - (3) When disposing of batteries in accordance with the Hazardous Waste Management Manual.
 - d. Battery serial numbers shall be recorded on receipt or transfer documents to facilitate cross-checking. Likewise transfer document numbers shall be entered in the comments section of the battery log.
 - e. Battery serial numbers will be included in the comments section of the aid servicing record.
6. TRAINING. Training needed to implement and maintain the procedures described in this instruction shall be accomplished by the NATON School and the District Aids to Navigation Training Teams. The Advanced Officer (ANC-OA) and Basic Officer (ANC-OB) Course and The Officer In Charge (ANC-ANT) Aids to Navigation Team course shall include these procedures in their curriculum. All District Aids to Navigation Training Teams shall include this training during visits to Aids to Navigation units within their districts.
7. IMPLEMENTATION.
- a. The requirements of this instruction will be implemented upon receipt of the identification decals.
 - b. Initial marking of batteries on aids with a history of frequent knockdowns and/or stolen batteries should be completed as soon as operations permit. Batteries on other aids should be marked at the next scheduled servicing visit. Due to workload considerations, batteries in floating aids may be marked at the next time the aid is on the deck of a servicing vessel.
 - c. District units will maintain local logs until ATONIS 2.0 is implemented.
8. RECORDS MAINTENANCE. The log books and property transfer documents (DD-1149 or DD-1348) which are produced pursuant to this Instruction are to be retained indefinitely by the unit records custodian. ATONIS historical files shall be maintained by the district office. A review of the maintenance of the battery log should be a routine part of District Aids to Navigation Training Team visits or appropriate MLC Compliance Inspections.

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9. FORMS/REPORTS. Periodic reports are not required. Ad hoc reports, prepared by district commanders, will be required to answer inquiries by federal, state or local regulatory authorities.

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Encl: (1) Battery tracking flow chart
(2) Key words and battery ID codes
(3) Sample log entries
(4) Blank log page



Description of Key Words/Codes.

Disposal. As used in this Instruction, "disposal" means the proper relinquishment of Coast Guard control of an ATON battery in accordance with applicable state and federal environmental laws and regulations.

Recycling. "Recycling" means the proper relinquishment of Coast Guard control of an ATON battery for reuse or recovery of valuable metals or other materials contained therein.

Vandalism. "Vandalism" means the destruction or loss of an ATON battery through the unlawful activity of an unknown third party.

Knockdown. "Knockdown" means the loss of an ATON battery through the collision of a vessel with an aid to navigation.

Weather related loss. "Weather related loss" means the loss of an ATON battery through the impacts of natural forces upon an ATON device or structure.

Accidental loss. "Accidental loss" means the loss of an ATON battery through individual Coast Guard personnel accident or mishap which leads to a battery being lost in the water or on the land. This term does not mean the loss of accountability for a battery through a failure to keep proper records.

Manufacturer Codes: The following codes will be used to identify battery manufacturer in the logging system described in the Instruction:

AB - Absolyte
CE - Celair
DE - Delco
DY - Dynasty
EX - Exide
SA - Saft Nile
SU - Sunlyre
UN - Union Carbide

(In the event that other batteries are procured and are tracked in the logging system, the first two letters of the manufacturer's name will be used to identify battery type in the battery log.)

The following details when entries are made into the battery log:

Scenario: Battery received by installing unit.

Action: Log battery serial number, battery type and receipt date (see lines 1 and 11 of sample log).

Scenario: Battery installed in AtoN.

Action: Log installation date and AtoNIS number (see lines 2 and 12 of sample log).

Scenario: Original installing unit replaces battery and recycles/disposes of battery:

Action: Log date removed from aid, date turned in and destination (Recycled, GRP HAZMAT) in comments section (see line 3 of sample log).

Scenario: Original installing unit replaces and reuses battery.

Action: Log date removed from aid and "Reused" in comments section. Enter battery number, type and date received in the log on a new line number (see lines 4 of sample log).

Scenario: Original installing unit responds to discrepancy and finds battery missing/lost:

Action: Log date lost and reason for loss (vandalism, collision, weather, etc.) in Comments section (see line 5 of sample log).

Scenario: Unit other than installing unit responds to discrepancy, finds battery and returns battery to original installing unit:

Action: Original installing unit makes appropriate log entry if battery is reused, disposed or recycled (see line 13 of sample log).

Scenario: Unit other than installing unit responds to discrepancy, finds battery but does not return battery to original installing unit:

Action: Other than installing unit logs serial number, battery type, AtoNIS number, date removed, disposition (reused, disposed, recycled) and DD149 in Comments section (see line 6 of sample log.) Unit other than installing sends DD149 to original installing unit stating disposition of battery, including reference disposal documents.

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Original installing unit logs date removed, and "Transferred to (Unit Name)" and DD149 in Comments section (see line 14 of sample log).

Scenario: Unit other than installing unit responds to discrepancy and does not find battery:

Action: Other than installing unit sends appropriate message info to original installing unit stating disposition of battery (vandalism, collision, weather, accidental loss). Original installing unit logs date lost, and reason and DTG in Comments section, if battery number can be traced to aid (see line 15 of sample log).

SAMPLE BATTERY LOG									
SERIAL NUMBER	BATT TYPE	DATE RECEIVED	DATE INSTALLED	ATONIS NUMBER	DATE REMOVED	DATE TURNED IN	DATE LOST	COMMENTS	
05-00001	DE	12/1/93							
05-00002	DE	12/1/93	1/24/94	123000					
05-00003	DE	12/1/93	1/25/94	123001	6/15/99	6/30/99		Recycled, GRP HAZ MAT DD1149	
05-00004	DE	12/1/93	1/25/94	123002	2/28/96			Reused - Hotpack see line 6	
05-00005	DE	6/12/94	6/30/94	123005			9/23/95	Vandalism	
05-00004	DE	2/28/96	7/20/96	123006	8/15/96			XFER CGC DD1149	
05-00104	SU			123008	8/15/96	8/30/96		Recycled, ABC Inc, MSG 092145Z	
05-00101	SU	1/20/94							
05-00102	SU	1/20/94	4/15/94	123010					
05-00103	SU	1/20/94	4/16/94	123011	2/12/95	2/28/95		Recycled, ABC Inc. DD1149	
05-00104	SU			123008	8/15/96	8/30/96		Xfer, ANT DD1149	
05-00105	SU	1/20/94	4/17/94	123012		9/13/96		Collision Msg 100925Z	

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